

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

OCEAN SEMICONDUCTOR LLC, <i>Plaintiff,</i> vs. MEDIATEK INC., ET AL., <i>Defendant.</i>	Case No. 6:20-cv-01210-ADA
OCEAN SEMICONDUCTOR LLC, <i>Plaintiff,</i> vs. NVIDIA CORPORATION, <i>Defendant.</i>	Case No. 6:20-cv-01211-ADA
OCEAN SEMICONDUCTOR LLC, <i>Plaintiff,</i> vs. NXP SEMICONDUCTORS NV, ET AL., <i>Defendant.</i>	Case No. 6:20-cv-01212-ADA
OCEAN SEMICONDUCTOR LLC, <i>Plaintiff,</i> vs. RENESAS ELECTRONICS CORPORATION, ET AL., <i>Defendant.</i>	Case No. 6:20-cv-01213-ADA
OCEAN SEMICONDUCTOR LLC, <i>Plaintiff,</i> vs. SILICON LABORATORIES INC., <i>Defendant.</i>	Case No. 6:20-cv-01214-ADA
OCEAN SEMICONDUCTOR LLC, <i>Plaintiff,</i> vs. STMICROELECTRONICS INC., <i>Defendant.</i>	Case No. 6:20-cv-01215-ADA
OCEAN SEMICONDUCTOR LLC, <i>Plaintiff,</i> vs. WESTERN DIGITAL TECHNOLOGIES, INC., <i>Defendant.</i>	Case No. 6:20-cv-01216-ADA

**STEPHANIE SIVINSKI'S DECLARATION IN SUPPORT OF DEFENDANTS'
OPENING CLAIM CONSTRUCTION BRIEF**

I, Stephanie Sivinski, declare and state as follows:

1. I am an attorney admitted to practice in the State of Texas.
2. I am a partner at the law firm Haynes and Boone LLP and represent Defendants MediaTek, Inc. and MediaTek USA, Inc.
3. I provide this declaration in support of the Defendants' Opening Claim Construction Brief. If called to testify as a witness, I could and would competently do so under oath. Portions of certain attached exhibits have been highlighted for the Court's convenience to indicate the relevant portions of that exhibit.
4. Attached as **Exhibit 1** is a true and correct copy of U.S. Patent No. 6,420,097.
5. Attached as **Exhibit 2** is a true and correct copy of U.S. Patent No. 6,660,651.
6. Attached as **Exhibit 3** is a true and correct copy of U.S. Patent No. 7,080,330.
7. Attached as **Exhibit 4** is a true and correct copy of U.S. Patent No. 8,676,538.
8. Attached as **Exhibit 5** is a true and correct copy of U.S. Patent No. 6,907,305.
9. Attached as **Exhibit 6** is a true and correct copy of U.S. Patent No. 6,968,248.
10. Attached as **Exhibit 7** is a true and correct copy of U.S. Patent No. 6,127,070.
11. Attached as **Exhibit 8** is a true and correct copy of U.S. Patent No. 6,140,023.
12. Attached as **Exhibit 9** is a true and correct copy of U.S. Patent No. 6,309,926.
13. Attached as **Exhibit 10** is a true and correct copy of U.S. Patent No. 6,162,587.
14. Attached as **Exhibit 11** is a true and correct copy of U.S. Patent No. 6,165,695.
15. Attached as **Exhibit 12** is a true and correct copy of U.S. Patent No. 6,762,133.
16. Attached as **Exhibit 13** is a true and correct copy of U.S. Patent No. 6,645,702.
17. Attached as **Exhibit 14** is a true and correct copy of U.S. Patent No. 6,746,973.
18. Attached as **Exhibit 15** is a true and correct copy of U.S. Patent No. 6,451,512.

19. Attached as **Exhibit 16** is a true and correct copy of U.S. Patent No. 6,156,480.
20. Attached as **Exhibit 17** is a true and correct copy of U.S. Patent No. 6,566,214.
21. Attached as **Exhibit 18** is a true and correct copy of U.S. Patent No. 6,326,319.
22. Attached as **Exhibit 19** is a true and correct copy of the definition of “pneumatic” in the American Heritage Dictionary, Fourth Edition, published in 2004.
23. Attached as **Exhibit 20** is a true and correct copy of the definition of “pneumatic” in Dictionary of Engineering, published in 1997.
24. Attached as **Exhibit 21** is a true and correct copy of the definition of “pneumatic” in Merriam-Webster’s Collegiate Dictionary, Tenth Edition, published in 1998 and bearing a copyright of 2001.
25. Attached as **Exhibit 22** is a true and correct copy of an excerpt of “Pneumatic Systems, Principles and Maintenance” by S. J. Majumdar, published in 1995.
26. Attached as **Exhibit 23** is a true and correct copy of Exhibit H to the Complaint in *Ocean Semiconductor LLC v. Western Digital Techs.*, No. 6:20-CV-1216 (W.D. Tex. Dec. 31, 2020), Dkt. 1-8. This exhibit is representative of Ocean’s infringement positions in all of the above-captioned cases.
27. Attached as **Exhibit 24** is a true and correct copy of Appendix A1 to Plaintiff’s Preliminary Infringement Contentions in *Ocean Semiconductor LLC v. Western Digital Techs.*, No. 6:20-CV-1216 (W.D. Tex. Dec. 31, 2020). This exhibit is representative of Ocean’s infringement positions in all of the above-captioned cases.
28. Attached as **Exhibit 25** is a true and correct copy of applicant’s appeal brief dated November 24, 2004 in the file history of U.S. Patent No. 6,907,305.
29. Attached as **Exhibit 26** is a true and correct copy of applicant’s response dated

September 8, 2003 in the file history of U.S. Patent No. 6,907,305.

30. Attached as **Exhibit 27** is a true and correct copy of applicant's response dated August 6, 2004 in the file history of U.S. Patent No. 6,907,305.

31. Attached as **Exhibit 28** is a true and correct copy of the definition of "concurrent" in Chambers Dictionary, New Ninth Edition, published in 2003.

32. Attached as **Exhibit 29** is a true and correct copy of the definition of "concurrent" in Webster's Unabridged Dictionary, Second Edition, published in 2001.

33. Attached as **Exhibit 30** is a true and correct copy of Ocean Semiconductor's Patent Owner's Preliminary Response to Western Digital's IPR on U.S. Patent No. 7,080,330, dated August 26, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 6, 2021



Stephanie Sivinski